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April 7, 2020

Via ECF  
Honorable Michael B. Kaplan, U.S.B.J.  
United States Bankruptcy Court  
Clarkson S. Fisher U.S. Courthouse  
402 East State Street, Courtroom #8  
Trenton, N.J. 08608

**RE: 18-10870-MBK  
GARY GALLEMORE  
Objection to Chapter 13 Trustee's Motion to Dismiss Case**

Dear Judge Kaplan:

Please accept this letter as an objection to the Motion to Dismiss Chapter 13 Case filed by the Chapter 13 Trustee. The Debtor is continuing efforts to modify the mortgage. During 2019, the debtor experienced severe health issues which ultimately forced debtor into an early disability related retirement in late 2019. This change in circumstances affected the debtor's income (i.e. making trustee payments) and ability to obtain a loan modification (loss of household income because of inability to work as much or work at all).

Because of the Debtor's compromised health, and the risk of COVID 19 infection I have been unable to meet with the debtor directly to modify the plan and request additional time to obtain a loan modification. The debtor has been making adequate protection payments to the mortgagee.

I have attached documents related to the debtor's current income which only recently stabilized. The debtor started receiving disability in March 2020 for the preceding month. The debtor also started receiving a disability pension in March 2020.

The debtor should be able to get this Chapter 13 case back on track as to Trustee payments and the loan modification provision as he has successfully navigated his way into retirement despite the disability. His income and his spouses's income are sufficient enough to make a significant modified mortgage payment every month if his mortgagee will now offer a permanent loan modification. I request this matter be adjourned 60 days to allow the debtor to fully oppose the motion and present a modified plan.

Respectfully,

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Avram White, Esq.

**Social Security Administration**  
**Retirement, Survivors and Disability Insurance**  
Notice of Award

Mid-Atlantic Program Service Center  
300 Spring Garden Street  
Philadelphia, Pennsylvania 19123-2992  
Date: February 17, 2020  
BNC#: 20MS500E28060-HA



0000188 00003916 2 MB 0.439 0213M3MCS2PI T28 P4



GARY GALLEMORE  
36 HEATH LN  
WILLINGBORO, NJ 08046-1720

You are entitled to monthly disability benefits beginning February 2020.

**The Date You Became Disabled**

We found that you became disabled under our rules on August 24, 2019.

To qualify for disability benefits, you must be disabled for five full calendar months in a row. The first month you are entitled to benefits is February 2020.

**What We Will Pay And When**

- You will receive \$2,420.00 for February 2020 around March 3, 2020.
- After that you will receive \$2,420.00 on or about the third of each month.

Administrator  
GENEROSO DiCHIARA  
Pension Fund Manager  
and  
Recording Secretary  
FRANCIA REED

**LOCAL 381 PENSION FUND**

160 MINEOLA BOULEVARD • MINEOLA, N.Y. 11501  
Tel. 516-248-2667  
Fax 516-248-2397

USW — AFL-CIO, CLC



Union Trustees  
ALVARO VARGAS  
FRANCIA REED  
  
Employer Trustees  
ALPHONSE FALCO  
TERRY OHLINGER

March 10, 2020

Mr. Gary Gallemore  
36 Heath Lane  
Willingboro, NJ 08046

Dear Mr. Gallemore:

Please be informed that the Board of Trustees has approved your application for a Disability 50% Husband & Wife Pension in the amount of ~~\$1116.31~~ per month effective ~~March 1, 2020~~. Since pension checks are sent at the END of the current month, you should receive first check April 1, 2020. As per your request, we will be deducting \$50.00 for federal taxes.

If there are any questions concerning your pension or other related problems, please do not hesitate to call.

Very truly yours,

Francia Reed  
Fund Manager